

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

Jeff Hulbert, *et al.*

Plaintiffs,

v.

Civil No.: 1:18-CV-00461-SAG

Sgt. Brian Pope, *et al.*

Defendants.

CONSENT MOTION TO EXTEND TIME

COMES NOW the Plaintiffs, by and through undersigned counsel, and respectfully submit this Consent Motion to Extend Time, and in support thereof, states as follows:

1. Defendants have consented to the relief sought herein.
2. On September 2, 2020, following a telephone conference with the parties, this Court entered an Order setting the schedule for dispositive motions. *See* ECF 67.
3. On November 20, 2020, the parties jointly filed a Joint Motion to Modify the Scheduling Order, extending the dispositive motions deadline due to a staffing shortage in Defendants' counsel's office and scheduling complications due to the upcoming holiday season. *See* ECF 73. The parties jointly requested the following extensions:

<u>Dispositive Motions Deadline:</u>	Extended from 12/02/2020 to 12/16/2020
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<u>Oppositions Deadline:</u>	Extended from 01/06/2021 to 01/20/2021
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<u>Reply Deadline:</u>	Extended from 01/27/2021 to 02/10/2021
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4. This Court granted the Parties' joint motion on November 20, 2020. *See* ECF 74.
5. As a result of the holiday season, Plaintiffs' counsel's office has numerous filing deadlines are occurring simultaneously. In addition, Plaintiffs' counsel's office has also faced scheduling complications as a result of the holiday season. Accordingly, Plaintiffs' counsel

contacted Defendants' counsel seeking a three-week extension of Plaintiffs' time to oppose the Defendants' Motion for Summary Judgment, ECF 76.

6. Defendants' counsel consented to the extension requested by Plaintiffs.

7. No prejudice will result from the extension of any deadline sought herein.

8. Accordingly, the Plaintiffs respectfully request the extension of the following deadlines, as consented to by Defendants:

Plaintiffs' Opposition Deadline: Extended from 01/20/2021 to 02/10/2021

Defendants' Reply Deadline: Extended from 02/10/2021 to 03/03/2021

WHEREFORE, the Plaintiffs respectfully request that this Honorable Court modify the deadlines as detailed above.

Respectfully submitted,

HANSEL LAW, P.C.

/s/ Cary J. Hansel, III

Cary Johnson Hansel, III, Esquire
Federal Bar No. 14722
cary@hansellaw.com
2514 North Charles Street
Baltimore, Maryland 21218
(301) 461-1040
(443) 451-8606 (facsimile)

Attorney for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this 19th day of January, 2021, I caused the foregoing to be filed via the Court's electronic filing system, which will make service on all parties entitled to service.

/s/ Cary J. Hansel

Cary J. Hansel

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ORDER

UPON CONSIDERATION of the Plaintiffs' Consent Motion to Extend Time, it is this it is this _____ day of _____, 2021, by the United States District Court for the District of Maryland, hereby

ORDERED, that the Plaintiffs' Consent Motion to Extend Time is hereby **GRANTED**; and it is further

ORDERED, that the following filing deadlines shall be modified as follows:

Plaintiffs' Opposition Deadline: Extended from 01/20/2021 to 02/10/2021

Defendants' Reply Deadline: Extended from 02/10/2021 to 03/03/2021

The Honorable Stephanie A. Gallagher,
Judge, U.S. District Court for the
District of Maryland